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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

BOARD OF TRUSTEES OF THE  
LABORERS HEALTH AND WELFARE  
TRUST FUND FOR NORTHERN  
CALIFORNIA; BOARD OF TRUSTEES OF  
THE LABORERS VACATION-HOLIDAY  
TRUST FUND FOR NORTHERN  
CALIFORNIA; BOARD OF TRUSTEES OF  
THE LABORERS PENSION TRUST FUND  
FOR NORTHERN CALIFORNIA; and  
BOARD OF TRUSTEES OF THE  
LABORERS TRAINING AND RETRAINING  
TRUST FUND FOR NORTHERN  
CALIFORNIA,

Plaintiffs,

vs.

CEIBAS ENTERPRISE, INC., a California  
corporation, dba SEXYTREES.COM,

Defendant.

Case No.: 4:24-cv-01696-KAW

**DECLARATION OF RONALD L.  
RICHMAN IN SUPPORT OF REQUEST  
FOR CLERK'S ENTRY OF DEFAULT**

I, RONALD L. RICHMAN, declare as follows:

1. I am a shareholder of the law firm of Bullivant Houser Bailey PC, counsel for plaintiffs the Board of Trustees of the Laborers Health and Welfare Trust Fund for Northern

1 California, Board of Trustees of the Laborers Vacation-Holiday Trust Fund for Northern  
2 California, Board of Trustees of the Laborers Pension Trust Fund for Northern California, and  
3 the Board of Trustees of the Laborers Training and Retraining Trust Fund for Northern  
4 California in this action.

5 2. I have personal knowledge of the following and, if called upon to testify, am  
6 competent to do so.

7 3. On April 16, 2024, plaintiffs filed their First Amended Complaint for Breach of  
8 Collective Bargaining Agreement; To Recover Unpaid Trust Fund Contributions; and for  
9 Mandatory Injunction. [Dkt. 9.] Defendant Ceibas Enterprise is a California corporation. The  
10 California Secretary of State Website, Corporations, identifies Alexander Jouse Llamas as its  
11 CEO, Secretary, CFO and Agent for Service of Process, all at the following address:  
12 2414 Exbourne Creek (the actual address is 2414 Exbourne *Court*), Walnut Creek, CA 94596.  
13 See **Exhibit A** attached hereto.

14 4. The address for the Agent for Service of Process, Alexander Jouse Llamas,  
15 2414 Exbourne Court, Walnut Creek, CA 94596, is a residential property. Because of the  
16 difficulty with serving Alexander Jouse Llamas, plaintiffs retained the service of a private  
17 investigator, Wheels of Justice. On June 24, 2024, substituted service was made at the  
18 residence, the location identified for purposes of service of process, 2414 Exbourne Court,  
19 Walnut Creek, CA 94596, by serving Mr. Llamas's father, an individual at the residence that  
20 identified himself as the "Father of Alexander". In addition, a copy of the summons and first  
21 amended complaint was also mailed, first class mail, to the location identified for purposes of  
22 service of process, 2414 Exbourne Court, Walnut Creek, CA 94596. See Declaration of Service  
23 of Process. [Dkt. 13].

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1           5.       As of the date of this request for clerk's entry of default, defendant has failed to  
2 file a responsive pleading. No cause exists which would prevent the Clerk of the Court from  
3 entering the default of defendant. Defendant is not a minor nor engaged in military service.

4           I declare under penalty of perjury under the laws of the United States of America that the  
5 foregoing is true and correct.

6           Executed on August 20, 2024, at San Francisco, California.

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RONALD L. RICHMAN

**DECLARATION OF RONALD L. RICHMAN IN SUPPORT OF  
REQUEST FOR CLERK'S ENTRY OF DEFAULT**

**EXHIBIT A**



STATE OF CALIFORNIA  
Office of the Secretary of State  
STATEMENT OF INFORMATION  
CORPORATION  
California Secretary of State  
1500 11th Street  
Sacramento, California 95814  
(916) 653-3516

For Office Use Only  
-FILED-  
File No.: BA20240311256  
Date Filed: 2/17/2024

Entity Details

Corporation Name

CEIBAS ENTERPRISE, INC.

Entity No.

3851714

Formed In

CALIFORNIA

Street Address of Principal Office of Corporation  
Principal Address

2414 EXBOURNE CREEK  
WALNUT CREEK, CA 94596

Mailing Address of Corporation  
Mailing Address

2414 EXBOURNE CREEK  
WALNUT CREEK, CA 94596

Attention

Street Address of California Office of Corporation  
Street Address of California Office

2414 EXBOURNE CREEK  
WALNUT CREEK, CA 94596

Officers

| Officer Name           | Officer Address                               | Position(s)                        |
|------------------------|---|------------------------------------|
| ALEXANDER JOSUE LLAMAS | 2414 EXBOURNE CREEK<br>WALNUT CREEK, CA 94596 | Chief Executive Officer            |
| Alexander Jouse Llamas | 2414 Exbourne Creek<br>Walnut Creek, CA 94596 | Secretary, Chief Financial Officer |

Additional Officers

| Officer Name | Officer Address | Position | Stated Position |
|--------------|-----------------|----------|-----------------|
| None Entered |                 |          |                 |

Directors

| Director Name          | Director Address                              |
|------------------------|---|
| Alexander Jouse Llamas | 2414 Exbourne Creek<br>Walnut Creek, CA 94596 |

The number of vacancies on Board of Directors is: 0

Agent for Service of Process

Agent Name

ALEXANDER JOUSE LLAMAS

Agent Address

2414 EXBOUR CT  
WALNUT CREEK, CA 94596

Type of Business

Type of Business

TREE CARE & REMOVAL

Email Notifications

Opt-in Email Notifications

No, I do NOT want to receive entity notifications via email. I prefer notifications by USPS mail.

Labor Judgment

No Officer or Director of this Corporation has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.

Electronic Signature

☒ By signing, I affirm that the information herein is true and correct and that I am authorized by California law to sign.

*Alexander Llamas*

*02/17/2024*

Signature

Date

**PROOF OF SERVICE**

***Board of Trustees of the Laborers Health and Welfare Trust Fund for  
Northern California, et al. v. Ceibas Enterprise, Inc., dba Sexytrees.com***  
**U.S.D.C. (N.D. Cal.) No. 4:24-cv-01696-KAW**

I am employed in the City and County of San Francisco by the law firm of Bullivant Houser Bailey ("the business"), 101 Montgomery Street, Suite 2600, San Francisco, CA 94104. I am over the age of eighteen (18) and not a party to this action. On August 20, 2024, I served the document entitled:

**DECLARATION OF RONALD L. RICHMAN IN SUPPORT OF  
REQUEST FOR CLERK'S ENTRY OF DEFAULT**

upon the following party:

ALEXANDER JOUSE LLAMAS,  
 Agent for Service of Process for  
 Ceibas Enterprise, Inc., dba Sexytrees.com  
 2414 Exbourne Court J  
 Walnut Creek, CA 94596

- (x) **BY MAIL (CCP §1013(a)):** I am readily familiar with the ordinary practice of the business with respect to the collection and processing of correspondence for mailing with the United States Postal Service. I placed a true and correct copy of the above-titled document in an envelope addressed as above, with first class postage thereon fully prepaid. I sealed the aforesaid envelope and placed it for collection and mailing by the United States Postal Service in accordance with the ordinary practice of the business. Correspondence so placed is ordinarily deposited by the business with the United States Postal Service on the same day.
- ( ) **BY EMAIL OR ELECTRONIC TRANSFER (CCP §1010.6(a)):** Pursuant to agreement between the parties, I caused a copy of the document to be sent from e-mail address roberta.beach@bullivant.com to the person at the e-mail address listed in the service list. I did not, within a reasonable time after the transmission, receive any electronic message or other indication that the transmission was unsuccessful.
- ( ) **BY FACSIMILE TRANSMISSION (CCP §1013(e), CRC 2.306):** I transmitted the document by facsimile transmission by placing it in a facsimile machine (telephone number 415-352-2701) and transmitting it to the facsimile machine telephone number listed above. A transmission report was properly issued by the transmitting facsimile machine. The transmission was reported as complete and without error. A true and correct copy of the transmission report is attached hereto.
- ( ) **BY OVERNIGHT DELIVERY (CCP §1013(c)):** I am readily familiar with the ordinary practice of the business with respect to the collection and processing of correspondence for mailing by Express Mail and other carriers providing for overnight delivery. I placed a true and correct copy of the above-titled document in an envelope addressed as above, with first class postage thereon fully prepaid. I sealed the aforesaid envelope and placed it for collection and mailing by Express Mail or other carrier for overnight delivery in accordance with the ordinary practice of the business. Correspondence so placed is ordinarily deposited by the business with Express Mail or other carrier on the same day.
- ( ) **BY PERSONAL SERVICE UPON AN ATTORNEY (CCP §1011(a)):** I placed a true and correct copy of the above-titled document in a sealed envelope addressed as indicated

1 above. I delivered said envelopes by hand to a receptionist or a person authorized to accept  
2 same at the address on the envelope, or, if no person was present, by leaving the envelope  
3 in a conspicuous place in the office between the hours of nine in the morning and five in  
the afternoon.

4 ( ) **BY MESSENGER SERVICE:** I placed a true and correct copy of the above-entitled  
5 document in a sealed envelope addressed as indicated above and provided it to a  
professional messenger service for delivery during normal business hours on this date.

6 ( ) **BY PERSONAL SERVICE UPON A PARTY (CCP §1011(b)):** I placed a true and  
7 correct copy of the above-titled document in a sealed envelope addressed as indicated  
8 above. I delivered each envelope by hand to a person of not less than eighteen (18) years  
of age at the address listed on the envelope, between the hours of eight in the morning and  
six in the evening.

9 I declare under penalty of perjury, under the laws of the State of California, that the  
foregoing is true and correct.

10 Executed on August 20, 2024, at San Francisco, California.

11 

12 ROBERTA C. BEACH

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